

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

Drop Box
RECEIVED

OCT 04 2004

PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY POWER)
COOPERATIVE, INC., INTER-COUNTY ENERGY)
COOPERATIVE CORPORATION, NOLIN RURAL)
ELECTRIC COOPERATIVE CORPORATION, AND)
SALT RIVER ELECTRIC COOPERATIVE)
CORPORATION, FOR AUTHORITY TO IMPLEMENT)
A FIXED BILL PILOT PROGRAM)

Case No. 2004-00330

SUPPLEMENTAL REQUEST FOR INFORMATION OF THE ATTORNEY GENERAL

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Requests for Information the Joint Applicants, to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,
GREGORY D. STIUMBO
ATTORNEY GENERAL



ELIZABETH BLACKFORD
DENNIS HOWARD II
ASSISTANT ATTORNEYS GENERAL
Office for Rate Intervention
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204
(502) 696-5353

CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 4th day of October, 2004, I have filed the original and ten copies of the foregoing with the Executive Director of the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601, and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

VICKIE ENGLE
MANAGER OF OFFICE SERVICES
INTER-COUNTY ENERGY COOPERATIVE CORP
P O BOX 87
DANVILLE KY 40423-0087

HON CHARLES A LILE
SENIOR CORPORATE COUNSEL
EKPC INC
P O BOX 707
WINCHESTER KY 40392-0707

MICHAEL L MILLER
PRESIDENT & CEO
NOLIN RECC
411 RING ROAD
ELIZABETHTOWN KY 42701-8701

LARRY HICKS
SALT RIVER ELECTRIC COOPERATIVE CORP
P O BOX 609
BARDSTOWN KY 40004



A handwritten signature in black ink, appearing to read "Larry Hicks", is written over a horizontal line.

Supplemental Request for Information
Of the Attorney General to EKPC, et al.

- 1) Follow-up to Response to AG-1-1 and 17:
 - a. Will meters be read monthly for the FB customer or read on the same cycle as they are read for standard residential customers, if standard reading is other than monthly? If not, how often will they be read?
 - b. If they are to be read less often, do EKPC or the participating member co-ops anticipate any savings associated with a reduction in meter reading costs?
 - c. Are load research meters already in place on enough standard residential customer accounts to constitute a control group, or will load research meters have to be installed for those chosen to be in the control group? If the later, is that cost included in the costs outlined in response to AG-1-1?

- 2) Follow-up to Response to AG-1-19: Can the impact of usage growth on peak demand resulting from “growth in usage induced by FB” be distinguished from “natural growth in usage” other than by comparison to the proxy control group? If so, how?

- 3) Follow-up to Response to AG-1-20: Are the Joint Applicants willing to expand surveys pertaining to the FB pilot to solicit from FB pilot customers the changes use or types of use that they, the customers, attribute to being on FB?

- 4) Follow-up to Response to AG-1-35, page 2 of 204: Do the Joint Applicants believe that the utilization of a price-based rate rather than a cost-based rate for the same class of customers violates KRS 278.170? Please explain.

- 5) Follow-up to Response to AG-1-35, page 10 of 204: The quoted article indicates flat pricing programs are not designed to earn a given return over any given year, but rather, over multiple years. Given that assumption, how would revenues and/or losses for any given year be treated in a test year for ratemaking purposes were the FB to become a permanent offering?